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the wildlife trade monitoring network



STRATEGIES FOR FIGHTING CORRUPTION IN WILDLIFE CONSERVATION: A PRIMER

A publication of the WWF and TRAFFIC Wildlife Crime Initiative

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About TRAFFIC

TRAFFIC, the wildlife trade monitoring network, is the leading non-governmental organization working globally on trade in wild animals and plants in the context of both biodiversity conservation and sustainable development. TRAFFIC is a strategic alliance of WWF and IUCN.

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Customs officials in Suvarnabhumi airport, Bangkok (Thailand), discover a shipment of African elephant tusks from Mozambique.

INTRODUCTION

This primer provides a practical framework for understanding corruption and why it is a problem for wildlife conservation, and for initiating processes that can reduce wildlife-related corruption.

“Addressing corruption is regarded by experts as one of the most critical factors in arresting the illegal wildlife trade.”

DLA Piper 2014, p.18

The primer suggests first steps in fighting corruption that can be implemented in the multiple sectors involved in wildlife conservation, including wildlife protection and management agencies, customs and border services, police, prosecutory services, the judiciary, offices responsible for the setting of legislation and policy, civil society organizations and the media. It is intended as a primer for TRAFFIC staff, but may also be useful to individuals working in the above sectors who encounter corruption as a problem.

Parts 1 and 2 of this primer introduce the reader to the problem of corruption and its relation to wildlife conservation and illegal trade in wild animals and plants, including timber and fisheries. **Part 1** explains what corruption is, how it affects wildlife conservation, and why it is important to reduce corruption in the areas of wildlife protection and wildlife law enforcement.

Part 2 provides descriptions and examples of common forms of corruption in the areas of wildlife protection and law enforcement. This section raises awareness of the various types of wildlife-related corruption and the kinds of situations in which they may occur.

Parts 3 and 4 of the primer are designed to help its users identify strategies for combating corruption. **Part 3** gives an overview of strategies that can be used to prevent and reduce corruption affecting wildlife conservation efforts. **Part 4** directs readers to more resources that can help in the fight against wildlife-related corruption.

PART 1: UNDERSTANDING WILDLIFE-RELATED CORRUPTION

WHAT IS CORRUPTION?

Corruption can be defined as the abuse of entrusted power for private gain.¹ It takes place when government officials or members of private organizations use their authority inappropriately to obtain benefits for themselves or others. This abuse of power can take many forms, including fraud, forgery, turning a blind eye to crimes, extortion, coercion, making decisions that favour friends or relatives, nepotism, trading in influence, embezzlement and laundering of the proceeds of crime. A common form of corrupt behaviour is bribery: the offering or giving of something of value in order to influence a public official or other individual in a position of power in the conduct of his or her duties.

Corruption may also involve individuals accepting favours or “goodwill” payments on the tacit understanding that these will eventually be rewarded by favours returned. Corruption may take place at a high level of government or business and involve the distortion of

¹ Transparency International 2014.

political, economic and legal systems by individuals in power to benefit themselves or their friends or family (“grand” corruption). Corruption may also occur in day-to-day abuses of power by low- and mid-level officials or employees in their interactions with each other and members of the public, as they illegally exchange favours for money or gifts (“petty” corruption). Grand corruption is particularly damaging because the decisions and amounts of money involved are more significant, and because it encourages corruption at lower levels.

WHAT CAUSES CORRUPTION?

“When police realize that no one is following up on their cases, it is easy for them to be compromised and help the suspects.”

Stephen Githinji, Chief Magistrate of the Naivasha Law Courts, Kenya, cited in DLA Piper 2014, pp.94–95

Corruption does not only affect organizations involved in the protection of wildlife, but occurs across multiple sectors of society – it is not confined to any particular economic tier, societal level, area of business or government sector. It is a widespread problem that occurs to varying extents and in diverse forms in all countries.

There is no one cause of corruption, but several factors contribute to a climate in which corruption is likely to flourish, whether in relation to wildlife trade or elsewhere. These include:

Lack of transparency and lack of accountability mechanisms. An absence of or inadequate measures for tracking, measuring and reporting performance and conduct make it easier to hide corrupt activities at any level and less likely that these activities will be caught or their perpetrators punished.

Lack of effective deterrents. Including low risk of detection for corrupt behaviours and lack of or insufficiently severe penalties for corruption when it is detected.

Rules and laws that are complex, ambiguous, confusing or contradictory, or that are difficult and expensive to implement. Under such circumstances, laws are often ignored or enforced only patchily.

Lack of social stigmas against corruption. In many countries, some forms of corruption may be seen as normal parts of the functioning of government, law enforcement agencies and businesses. Particularly in countries where trust in political authority and law enforcement is low, some individuals may consider it acceptable to circumvent laws in order to benefit themselves, their family or their friends.

Lack of personnel, equipment and training. Lack of resources potentially promotes corruption in a number of ways, including making it harder to detect and prosecute corruption and harder or impossible to enforce laws and rules. Lack of training can mean that officials and employees are unclear about their responsibilities, the laws and rules they must abide by and enforce, and the means available to them for doing so. Individuals may also lack training in what behaviours constitute corrupt practices or activities.

Low or irregular pay. Badly-paid officials and employees may be tempted or may need to supplement their income by accepting bribes, kickbacks or other illegal and unethical benefits.

Perceptions that certain corrupt behaviours are “victimless” or do not have serious consequences. Some forms of corruption may not seem very morally problematic to the individuals involved. Much corruption, including corruption involved in wildlife crime, takes place far from the place where the harm is inflicted, and so this harm may not be obvious.

Conflicts of interest. This may occur if individuals have an interest, or have friends or family members with an interest, in areas over which they have authority, e.g. if an official has friends or family members who are suspects in a crime, or who have business interests in an area the official oversees or participates in managing.

Weak judicial independence. This leaves judges vulnerable to pressure from other areas of government to influence their decisions.

Mitigating any of the factors identified on this list can help make the environment less friendly to corruption, and so reduce corrupt activities. **Parts 3** and **4** of this primer direct readers to strategies for addressing some of the above problems.

WHY IS CORRUPTION A PROBLEM?

Whether it takes place in relation to wildlife or in other areas, corruption undermines the effectiveness of laws and good governance, making it difficult for governments to manage their resources and infrastructure, enact policy and fight crime. Corrupt activities counteract the work of committed and honest individuals in every sector and, when they occur in government agencies, undermine trust in these agencies.

Grand corruption distorts economic decision-making, deters investment and undermines nations’ competitiveness, reducing economic growth.²

Corruption at any level results in the misdirection of public money to private individuals and the subversion of public processes for individual benefit. Corruption also often involves or facilitates violence.

WHAT IS WILDLIFE-RELATED CORRUPTION?

Corruption that facilitates wildlife crime is for all intents and purposes identical to that associated with other crimes. Like with other forms of corruption, wildlife-related corruption involves the abuse of power for private gain, and this abuse results in the undermining of laws and systems – in this case, laws and systems that have been put in place to protect wildlife and regulate wildlife trade.³

Corruption is one of the biggest facilitators of illegal wildlife trade. Corrupt activities can take place at every stage in the illegal trade in restricted animals, animal parts, plants and timber, from poaching, illegal logging and illegal fishing through transportation of illegally poached or harvested goods, processing and export, to the sale of illegal wildlife products and laundering of proceeds. Corruption also undermines attempts to apprehend and prosecute those involved in wildlife crime, for example through the bribing or coercion of law enforcement officers, prosecutors or judges in order to avoid investigation or to influence court decisions.

“In some countries, a lack of separation of the State’s judiciary function from the functions of the executive and legislative branches is a common problem, leading to widespread interference in the affairs of the judiciary and corruption at all levels, including in the wildlife and forestry sectors.”

UNODC 2012, p.117

² Lawson and Vines 2014, p.ix.

³ ADB-CITES Symposium; DLA Piper 2014; Setiono 2007.

WHY IS WILDLIFE-RELATED CORRUPTION A PROBLEM?

“...in the context of illegal wildlife trade, bribes have occurred [...] in all levels of government, from Customs officials who accept bribes to allow smuggling, to government officials who accept bribes for making policy decisions in the wildlife sector.”

ADB-CITES Symposium
2013, p.23

Corruption undermines the best efforts of governments, international bodies and civil society to protect wildlife and regulate trade effectively. In addition, the corruption of individuals in wildlife protection agencies, law enforcement agencies, Customs and border agencies and the judiciary in order to facilitate wildlife crime undermines these institutions. The usefulness of corrupt officials for the highly profitable illegal wildlife trade creates a motive for those involved in this trade to prevent the development of transparent, ethical and well-functioning government institutions.⁴

Corruption is a major obstacle to wildlife conservation and the management of a country’s natural resources. Corruption enables poaching and illegal logging both of species in which trade is legal but regulated and of species in which trade is illegal. Corrupt activities allow illegal wildlife traders to circumvent checkpoints and licensing and certification requirements designed to maintain quotas or regulate trade. Corruption facilitates the secretive or open sale of illegally collected wildlife and the movement of illegal wildlife domestically and across borders. Corrupt activities can also ensure the immunity of poachers, traffickers and their associates from prosecution, even after they have been apprehended.

Steep declines of wildlife, including iconic animals like tigers, elephants and rhinos, are among the more widely publicized impacts of this trade. Many other species of animals, including pangolins, reptiles, birds and fish, as well as numerous species of plants and trees, are also threatened by illegal removal from the wild.

Impacts of illegal wildlife trade:

- Damages biodiversity and ecosystems, causing extinction as well as cascade effects that can damage water supply, food production and habitats on which human beings depend.
- Poses health risks by circumventing measures that regulate legal trade in animals, plants and timber.
- Robs countries of revenue from tax, duty and the sale of licenses and concessions, and hinders countries’ efforts to manage their natural resources for the benefit of the national economy and socio-economic development.

“...in some cases, corruption in the forestry sector may be an intrinsic part of the patronage systems that sustain the power of a country’s ruling elite.”

UNODC 2012, p.54

Illegal wildlife trade is one of the largest sectors of illegal commerce in the world, thought to be worth billions of US dollars annually.

The scale of this trade, the importance of corruption in facilitating it, and the seriousness of its consequences should make addressing wildlife-related corruption a high priority for governments and law enforcement agencies. Recently, illegal wildlife trafficking has been widely recognized as a serious threat to national and international security. Much illegal wildlife trafficking is carried out by organized, often international, crime networks, and some may even fund terrorist groups and civil conflict.⁵

4 Lawson and Vines 2014, p.7.
5 Cardamone 2012, pp.3–4.

WHAT PROBLEMS AFFECT ANTI-CORRUPTION EFFORTS IN WILDLIFE CONSERVATION?

“Arguably the greatest impediments to effective wildlife enforcement involve corruption at local, regional, and international levels.”

ADB-CITES Symposium
2013, p.122

Governments tend not to give high priority to the issue of wildlife crime, including wildlife-related corruption. At the same time, globalization has increased opportunities for concealed transactions, especially where law enforcement and agencies charged with protecting wildlife are under-resourced and poorly supervised.

In many countries, agencies responsible for combating wildlife crime, including addressing corruption in this area, lack the capacity and resources to do so. This may be due to a lack of priority for wildlife crime, a general lack of resources or infrastructure, or vested interests among decision-makers in maintaining corrupt institutions, which allow them to continue to enrich themselves illegally. In the case of wildlife-related crimes, there may also be a perception that the problem is essentially victimless, and as a result these crimes and any corruption associated with them may not be seen as a serious problem.

WHAT RESOURCES ARE AVAILABLE TO HELP COMBAT CORRUPTION RELATED TO WILDLIFE CRIME?

It is estimated that the Indonesian government loses about half of Indonesia’s estimated US\$4 billion annual fishing revenue to illegal, unregulated fishing

ADB-CITES Symposium
2013, p.10

Several tools for combating corruption have been produced by governments and other agencies. These include international Conventions against corruption, national legislation that criminalises and requires the penalization of corrupt activities, guidelines on anti-corruption laws and improving transparency, anti-corruption toolkits and training materials. Many of these tools include strategies that can be used to counter corruption related to wildlife crime.

International Conventions, such as the United Nations Convention Against Corruption (UNCAC) and the OECD Anti-Bribery Convention, are legally binding agreements that require states that are Parties to implement anti-corruption measures outlined in the Conventions.

United Nations agencies and the anti-corruption organization Transparency International have produced a number of resources for combating corruption. The Wildlife and Forest Crime Analytic Toolkit, produced by the United Nations Office on Drugs and Crime (UNODC), provides a range of tools for fighting wildlife crime.

Many of these tools specifically target wildlife-related corruption. Transparency International’s Analysing Corruption in the Forestry Sector provides guidelines for combating corruption in the Southeast Asian timber trade.

Part 4 of this primer provides descriptions of these and other resources for combating corruption in sectors related to illegal wildlife trade.

PART 2: CORRUPTION AND THE ILLEGAL WILDLIFE TRADE

Illegal wildlife trade is facilitated by many diverse forms of corruption. Examples include wildlife protection, management and enforcement personnel turning a blind eye to or facilitating wildlife poaching, fishing, logging, trafficking or other illegal activities, document fraud, the misplacement of records relating to prosecution, and even participation in illegal wildlife trade by individuals charged with protecting wildlife.

Many of these corrupt behaviours take place in exchange for bribes, but they may also be influenced by coercion, intimidation, conflicts of interests or other factors.

Below, some of the most common forms of corruption in the illegal wildlife trade are described under the categories of (1) ***in situ* failures to protect trade-restricted species**, (2) **failures to prevent transport and trade of trade-restricted species**, (3) **issuance of false documentation**, and (4) **failures to prosecute cases of wildlife crime**.

Many of the enabling factors for corruption described in **Part 1** of this document are present where illegal wildlife trade operates. These include lack of effective deterrents, lack of transparency, and perceptions of illegal trade in wildlife as a victimless crime.

In particular, efforts to counter illegal trade in wildlife are hampered in many jurisdictions by lack of resources for wildlife managers, wardens and rangers, police, Customs officials, prosecutors, judiciary and others. These factors enable corruption and impede honest individuals in fulfilling their responsibilities.

It is not always easy to determine whether failures in wildlife protection and enforcement are due to corruption or to insufficient personnel, training, procedures and equipment. However, many of the strategies for reducing corruption listed in **Part 3** of this primer are preventative and constitute best practice. As such, they can be implemented whether or not corruption has been shown to be present. Many of these strategies will also help with other problems such as under-resourcing or lack of awareness that, along with corruption, hinder efforts to protect wildlife.



11-26
MILLION
TONNES OF FISH
HARVESTED ILLICITLY
EACH YEAR

the United Nations Food and Agriculture Organization’s Fisheries and Aquaculture Department to “amount to 11–26 million tonnes of fish harvested illicitly each year, worth between \$10 and \$24 billion.”⁹

Failures by government, wildlife management or enforcement personnel to protect trade-restricted species often involve corruption. In some cases, individuals tasked with enforcing laws that protect wildlife may accept bribes in return for allowing these laws to be breached. This may take the form of turning a blind eye to illegal activities such as poaching or logging, colluding in these activities, or even carrying out these activities themselves.

It is important to recognize that many failures to protect trade-restricted species reflect lack of resources, personnel or training rather than or as well as corrupt behaviours. There are many examples of wildlife protection personnel risking and even losing their lives to enforce environmental laws. Agencies tasked with protecting wildlife often do not have the capacity to patrol their territories effectively, apprehend poachers or traffickers, who may be well-armed and well-resourced, or investigate potential violations of wildlife law. Wildlife protection personnel may also not have sufficient training to recognize illegal species that are being gathered or moved. Reducing corruption in agencies tasked with protecting wildlife *in situ* must therefore be undertaken alongside strategies to improve capacity, resources, and training.

Corrupt activities by wildlife wardens, rangers and managers that facilitate illegal collection of wildlife include:

- Turning a blind eye to poaching, illegal fishing, illegal logging or other illegal removal of wildlife
- Providing information to wildlife traffickers about patrols or other measures taken to protect wildlife, in order to help traffickers avoid these measures
- Failing to perform patrols or other measures intended to protect wildlife, in order to enable traffickers to illegally collect wildlife
- Providing information to wildlife traffickers about location of wildlife or other information intended to help traffickers in the illegal collection of wildlife
- Participating in the illegal collection of wildlife
- Issuing permits or licences for the collection of wildlife without the proper requirements

FAILURES TO PREVENT TRADE OR TRANSPORTATION OF TRADE-RESTRICTED SPECIES

Wildlife that has been illegally removed from the wild is sold domestically in its source country or overseas in wildlife markets, retail outlets and online. Illegal wildlife products are moved through countries and across borders and sold both openly and covertly. Much of the trade goes on undetected and so is difficult to measure, but it is

Forms of corruption

IN SITU FAILURES TO PROTECT TRADE-RESTRICTED SPECIES

The number of violations of laws that are intended to protect wildlife and regulate trade is enormous. As a result, large numbers of animals, plants and fish are illegally removed from the wild. For example, the number of African elephants killed illegally was estimated as more than 22,000 in 2012 alone.⁶ Illegal logging is thought to comprise a significant percentage of all logging worldwide⁷, and in some countries may significantly outweigh legal logging.⁸ Illegal, unreported and unregulated fishing is claimed by

⁶ TRAFFIC 2013.
⁷ Setiono 2007, p.27.
⁸ Milledge, Gelvas and Ahrends 2007.

⁹ FAO 2014.



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White Rhino calf, mother and juvenile male in holding pens at Hluhluwe-imfolozi Park, South Africa

certain that an enormous quantity of illicit wildlife is shipped and sold internationally. For example, despite CITES Appendix II protection and a prohibition on the export of any wild-caught specimens, the annual international trade in pangolins is estimated to involve 43 800–62 800 animals.¹⁰ Massive seizures of ivory in Kuala Lumpur in 2012 and Singapore in 2002 involved 6034.3 kilogrammes and 7.2 tonnes of ivory respectively¹¹, and in April 2015 four tonnes of ivory was seized in Bangkok.¹²

Corrupt activities by inspectors of retail facilities and enforcement agencies that facilitate illegal sale of wildlife include:

- Turning a blind eye to the illicit sale of wildlife
- Providing information to traders of illegal wildlife on upcoming inspections, in order to help traders avoid detection

In some cases, wildlife is hidden and passes through checks unknown to Customs and border officials, or it is accompanied by false documentation. In other cases, Customs officials may turn a blind eye, give tip-offs, or help conceal illegal wildlife in exchange for bribes or other benefits. The open sale of trade-restricted species in markets or shops may also suggest that members of inspection and/or enforcement agencies are deliberately turning a blind eye or colluding with traffickers to allow illegal wildlife products to be traded. Longstanding cultural traditions of selling particular kinds of wildlife or a lack of social stigmas against selling wildlife illegally may contribute to an acceptance of wildlife black markets by personnel tasked with preventing the illegal sale of wildlife.

On the other hand, the open selling of illegally traded wildlife and in many cases the passage of illegal wildlife through checkpoints and borders may reflect a lack of capacity or training or a low priority for preventing wildlife crime. Strategies for preventing corruption outlined in **Part 3** of this primer can help ensure that the sale and transportation of wildlife are monitored and checked properly, increasing the chance of detecting and stopping illegal wildlife trade whether it results from corruption or other factors.

Corrupt activities by Customs and border officials or checkpoint inspectors that facilitate illegal transportation of wildlife include:

- Turning a blind eye to the passage of illegally collected wildlife
- Failing to inspect shipments, in order to allow passage of illegally collected wildlife
- Failing to check or follow up on documentation, in order to allow passage of illegally collected wildlife
- “Rubber-stamping” shipments of wildlife known or suspected to have been illegally collected
- Providing information about checkpoints and inspections to illegal wildlife traffickers in order to help them avoid checks

¹⁰ ABD-CITES Symposium 2013, p.11. TRAFFIC 2013.
¹¹ TRAFFIC 2012.
¹² TRAFFIC 2015.

The open sale of trade-restricted species in markets or shops may also suggest that members of inspection and/or enforcement agencies are deliberately turning a blind eye or colluding with traffickers to allow illegal wildlife products to be traded. Longstanding cultural traditions of selling particular kinds of wildlife or a lack of social stigmas against selling wildlife illegally may contribute to an acceptance of wildlife black markets by personnel tasked with preventing the illegal sale of wildlife.

ISSUANCE OF FALSE DOCUMENTATION

The requirements for licences, permits and other forms of documentation to collect, breed, transport and trade wildlife legally gives rise to numerous possibilities for falsifying documents. Permits and certificates can be obtained illegally through fraud, favouritism, theft, forgery or bribery. False information may be entered into documents with or without the knowledge of officials, or documents themselves may be forged. In addition to the falsification of paper documents, documentation of wildlife may be falsified by altering identifying marks on plants and animals.¹³

Document fraud may be carried out without the knowledge or co-operation of the individuals responsible for issuing or verifying permits and licences, but it can involve corruption if these individuals are complicit in supplying blank documents, falsifying information, issuing documentation or turning a blind eye to documentation they know to be false.

Methods for smuggling wildlife are sophisticated, involving practices for laundering illegal wildlife. Individuals and organizations involved in illegal wildlife trade may also run legal businesses including trading, import and export, and transport and shipping businesses. This enables them to integrate illegal wildlife products with legal products, and launder the proceeds of wildlife crime through integration with proceeds from their legitimate businesses.¹⁴ Document fraud and corrupt officials who facilitate such fraud allow illegal wildlife to enter the legal market.

Forms of corruption that can lead to failures of prosecution include:

- Failing to investigate suspected instances of wildlife crime
- Providing tip-offs about investigations to suspects of wildlife crimes
- Deliberately losing, contaminating or failing to gather evidence
- Deliberately losing records
- Deliberately delaying cases
- Coercing witnesses, investigators, prosecutors or judges
- Bribing prosecutors, investigators or judges
- Conflicts of interest of investigators, prosecutors or judges
- Improper influence of senior officials or politicians over investigators, prosecutors and the judiciary

¹³ UNODC 2012, p.36, p.46.
¹⁴ Setiono 2007, p.29.



Example 1: Papua, Indonesia

Financial backers of the illegal timber trade in Papua, Indonesia are alleged to have provided bribes to forestry regulators in exchange for logging permits or access to forests managed by the Ministry of Forestry, including national parks. Because timber is bulky and difficult to conceal, some collusion by forest rangers, law enforcement and other officials is usually necessary in order to harvest and move timber illegally.

Forestry policy and financial analyst Bambang Setiono claims that “Illegal logging in Indonesia, Honduras, or any other producing and developing countries always involves corruption and bribery, smuggling, forgery, and illicit trafficking.”
- Setiono 2007 p.29, p.35



Example 2: South Africa

A 2012 report by TRAFFIC notes that in South Africa, corrupt wildlife wardens and other game industry professionals, including game ranch owners, vets, pilots and game capture operators, have recently participated in rhino poaching. The report notes that “a growing number of rhinos have been killed by a single shot from a high-calibre weapon characteristically only used by wildlife professionals or, less frequently, have been darted with immobilization drugs and had their horns removed.”

In 2012, four SANParks officials were arrested in relation to rhino poaching and the Reserve Manager for Atherstone Nature Reserve in Limpopo committed suicide after being investigated for allegedly assisting in poaching five rhinos.
- Milliken and Shaw 2012, p.11, p.75



Example 3: Viet Nam

Rhino horns are most frequently traded in Viet Nam, where their sale is illegal but, according to a 2012 TRAFFIC report, often an “open secret.” Rhino horns have long been sold by traditional medicine practitioners and retailers, but recently have been found for sale in other types of stores and online, including through social networking sites, and may be exchanged as luxury gifts. According to TRAFFIC, “certain dealers and users in Viet Nam often claim protective immunity from law enforcement actions.” - Milliken and Shaw 2012, p.125f



Example 4: Tanzania

According to a report based on data from 2004, in Tanzania legal timber may amount to as little as 4% of all timber harvested. Much of this illegal timber enters the legal market by being fraudulently certified (“rubber-stamped”) as legal by government officials. Large quantities of timber harvested in Tanzania are marked as legal by using forged hammers to affix identifying marks to the wood.

Between 2002 and 2003, Tanzania reported exporting a total of 19 300 cubic metres of timber. However, during this period import statistics for Tanzanian timber in China alone exceeded 108 500 cubic metres. This suggests that much of the documentation accompanying timber imported to China was falsified.
- Milledge, Gervas and Ahrends 2007



Example 5: Germany

In 2011 German Customs officers confiscated 119 live reptiles, mostly green tree pythons (*Morelia viridis*), that were being imported from Indonesia. According to Germany’s 2011–2012 biennial report to CITES, “The shipment contained in total 143 protected live reptiles covered by Indonesian export permits and the required import permits” as well as “9 live specimens which were not covered by any documents.”

Documentation accompanying the reptiles certified them as bred in captivity, but Customs officers suspected that the specimens had been collected from the wild. On-the-spot expert investigation confirmed that the reptiles were wild-caught on the basis of their health, behaviour and the presence of parasites usually found only in wild animals. Samples of blood and faeces further confirmed the presence of parasites that are unusual in captive-bred animals, and the specimens were confiscated.

Documents accompanying the reptiles had been falsified by the entering of source codes “C” and “F” for captive-bred specimens (rather than “W” for wild-caught). It is not clear whether the documents were obtained with the collusion of officials responsible for certifying the accuracy of information entered in the permits. - BFN 2012, p.46

FAILURES TO PROSECUTE CASES OF ILLEGAL WILDLIFE TRADE EFFECTIVELY

“...to achieve an effective response, wildlife and forest offences need to be addressed via a co-ordinated and multisectoral approach.”

UNODC 2012, pp.1–2

Even when instances of illegal wildlife trade or corruption facilitating such trade have been identified, the individuals involved are often not prosecuted or are insufficiently penalised to act as a deterrent. In some cases, this is the result of lack of resources, lack of training in what kinds of evidence need to be collected, or lack of interest in pursuing wildlife-related crimes. However, failures of enforcement authorities, prosecutorial offices and the judiciary to effectively prosecute cases of illegal wildlife trade may also be due to corruption.

Officials working in law enforcement, prosecution and the judiciary may be persuaded by bribes, intimidation, political pressure or conflicts of interest to lose files, delay cases, give tip-offs about investigations, hand out reduced sentences or release suspects.

Types of document fraud related to illegal wildlife trade include:

- Illegally obtaining permits for export or collection of trade-restricted species through theft, forgery or duplication
- Entering false information on permits for export of trade-restricted species
- Declaring lower values or volumes for wildlife in trade in order to evade quotas, payment of duty or regulations
- Documentation falsely stating that animals collected from the wild have been captive bred
- Misrepresentation of country origins of trade-restricted species
- Falsely representing trade-restricted species as unrestricted look-alikes
- Addition, removal or alteration of marks affixed to wildlife

Witnesses may be intimidated or disappear and evidence may be “lost.” In some countries, senior government officials may be exposed to conflicts of interest, coercion or offers of bribes that could induce them to influence judicial and other decisions.

Delays and procedural errors, whether they occur deliberately as a result of corruption or inadvertently through lack of resources, may cause cases to fall apart.

Delays also give criminal organizations time to dissociate themselves from the accused, meaning that the big players escape investigation or conviction.¹⁵ It is not always possible to determine whether specific failures of prosecution result from corruption.

Furthermore, corruption and inadequate resources and procedures can facilitate each other. For example, in many organizations record-keeping procedures are inadequate due to lack of resources or training, and a high percentage of missing records makes it easy to deliberately hide evidence and information.

The desire to hide evidence may then provide a motive for some individuals to perpetuate inefficient record-storage procedures.

Improving secure storage of evidence and records, accountability, public oversight, training and resourcing can address problems stemming from inefficiency as well as those that result from corrupt activities.

Part 3 of this primer lists several strategies that can improve the functioning of enforcement agencies and make these less comfortable environments for corruption.

¹⁵ DLA Piper 2014, p.176.

Table 1:
Examples of corruption facilitating different stages in the illegal wildlife trade

Stage in illegal trade	Individuals involved	Forms of corruption	Effects of corruption
● Setting of policy and legislation	→ Senior government officials → Legislators	Grand corruption: → Nepotism → Cronyism → Trading in influence → Conflicts of interest → Bribery → Goodwill payments	→ Compromised decision-making on policy, legislation, resource allocation and natural resource management → Enables wildlife crime and further corruption
● Issuance of permits and licences for legal hunting, fishing, logging or other collection of wildlife	→ Senior officials in wildlife or forestry agencies → Other officials and managers responsible for issuing documentation	Document fraud: → Forgery, theft or illegal duplication → False declarations with or without knowledge of officials → Bribery → Favouritism	→ Enables poaching, illegal logging and illegal collection of wildlife → Illegally collected wildlife may appear to have been gathered legally
● Poaching, illegal logging, illegal fishing and other illegal collection of wildlife	→ Wildlife wardens, forest and park rangers	→ Turning a blind eye Participating in poaching and other illegal activities → Document fraud → Bribery	→ Protected species are removed from the wild → Possible local extinction of species of wildlife → Cascade effects
● Transportation and export/import of illegal wildlife products	→ Inspectors at checkpoints → Border officials → Customs officials	→ Turning a blind eye Concealing shipments → Bribery → Document fraud	→ Illegally collected wildlife passes checkpoints → Illegal wildlife enters foreign markets → Illegal wildlife may appear to be legally exported → Possible spread of disease
● Sale of illegal wildlife products	→ Police → Inspection agencies	→ Document fraud → Turning a blind eye → Collusion → Bribery	→ Wildlife is sold illegally either openly or covertly exported → Possible spread of disease
● Investigation and prosecution of wildlife criminals	→ Police → Wildlife wardens and rangers → Prosecutors → Judges → Government officials with improper influence over judicial and prosecutorial services	→ Failures to investigate → Tip-offs for investigations → Losing evidence → Delaying cases → Releasing suspects → Imposing low penalties or not imposing penalties → Bribery	→ Protected species are removed from the wild → Possible local extinction of species of wildlife → Cascade effects



A Forestry Department official inspects, photographs and weighs an Asiatic bear skin found for sale in a store selling herbal products, Phnom Penh, Cambodia.

PART 3: STRATEGIES FOR COMBATING WILDLIFE-RELATED CORRUPTION

This section provides a list of strategies for preventing or reducing corruption that facilitates illegal wildlife trade.

This list is an overview that can function as a first point of reference for individuals and organizations hoping to combat corruption.

More detail on developing and implementing these strategies can be found in the resources described in **Part 4** of this primer. As **Part 1** of this document describes, many factors enable corruption, including in the illegal wildlife trade, which involves a wide variety of participants and many sectors of the economy and government. This means that fighting wildlife-related corruption requires a multifaceted approach that involves as many agencies as possible.

Anti-corruption strategies must target all stages of the illegal wildlife trade, from poaching, illegal fishing, illegal collection of plants or illegal logging, through processing, transport and export/import, to sale, consumption and laundering of profits. Since as well as facilitating the illegal movement and sale of wildlife, corruption may hinder the capture and prosecution of criminals involved in the trade and even the setting of policy and legislation relating to wildlife, it is also important to address corruption in these areas.

The strategies outlined below may be used by wildlife wardens or rangers, police, Customs officers, prosecutorial officers, the judiciary, anti-corruption units or individuals charged with combating corruption within organizations, legislators, policy-makers, the media, civil society organizations (CSOs) and the public. Not all of the strategies on the list are relevant to any given area related to wildlife protection or suitable in every situation. Individuals and groups working to fight corruption should evaluate the specific problems and circumstances in their country and place of work and choose the most useful and appropriate strategies for their area.

The strategies on this list have been organized into the following categories: policy and legislation; co-operation; accountability; judicial integrity; law enforcement; protection; human resources; resourcing; integrity; records and documentation; anti-money laundering; strategies for CSOs; awareness; and other strategies. At the end of this section, a trade-chain diagram illustrates points in the illegal wildlife trade where various anti-corruption strategies could be applied (figure 1).

Legislation and enforcement must “differentiate between activities driven by need and poverty, and those driven by greed and the lure for high profit.”

UNODC 2012, p.143

POLICY AND LEGISLATION

Clear and enforceable policies and laws are essential for combating corruption and illegal wildlife trade. Furthermore, many of the strategies outlined in this primer require high-level political commitment, which should be reflected in policies and legislation that require the development of measures for protecting wildlife, regulating wildlife trade and reducing corruption.

1. Develop a clear national wildlife policy.

This can guide development of legislation and assignment of budgets for the protection of wildlife. A clear policy reduces ambiguity and prevents lack of clarity on how wildlife regulations are to be implemented.

2. Clarify laws.

In some jurisdictions laws may be poorly developed and include gaps, or they may have the opposite problem and be too extensive or complex to be properly enforced. Simplify or develop laws to give clear, comprehensive guidance on wildlife crime and corruption. Tools to help develop such laws can be found in the Wildlife and Forest Crime Analytic Toolkit produced by UNODC.

3. Ensure wildlife and anti-corruption laws are practical and possible to implement.

Laws that are unclear, confusing or contradictory, or that are cumbersome to follow, monitor and enforce, are unlikely to be implemented successfully and may leave room for corrupt practices to occur.

4. Ensure wildlife and anti-corruption laws are socially acceptable.

While laws must address wildlife crime and corruption, they should take into account cultural and traditional practices and the needs of communities dependent on forests or wildlife. Courts, prosecutors and wildlife enforcement officers may not be comfortable implementing laws that conflict with social norms regarding the use of wildlife, or that heavily penalize practices that are corrupt but that have not traditionally been stigmatized.

5. Disseminate laws broadly.

To judges, prosecutors, wildlife enforcement personnel and the public. In order to do this, laws must be clearly written and easy to understand.

6. Criminalize corruption.

Laws should explicitly prohibit and establish penalties for specific forms of corruption.

7. Criminalize activities that undermine attempts to control wildlife trade.

Such activities include violating conditions of permits for hunting, collecting, transporting, exporting/importing and trading wildlife, adding, removing or altering marks attached to wildlife, and making false or misleading statements to enforcement personnel.

8. Establish clear sentencing guidelines for wildlife crime and corruption.

Sentencing guidelines should allow some discretion but ensure penalties are significant enough to act as a deterrent and that they are imposed, possibly by attaching minimum sentences to certain crimes. Maximum sentences may also be useful, as they indicate expectations for sentencing and can exert pressure on judges who impose lower sentences to justify their leniency.

9. Increase penalties for wildlife crime and corruption.

Higher penalties may have an increased deterrent effect. However, care must be taken as higher penalties may add to incentives to pay bribes in order to avoid penalization.¹⁶

10. Design legislation that targets the right people.

To prevent wildlife crime and corruption, legislation must penalize the right people, i.e. organized, often international smugglers motivated by profit, not people who depend on wildlife or are driven to poach by poverty.

11. List corrupt activities and wildlife crimes as serious crimes under the law.

The United Nations Convention against Transnational Organized Crime (UNTOC) defines a “serious crime” as “conduct constituting an offence punishable by a maximum deprivation of liberty of at least four years or a more serious penalty.” Crimes included in this category vary by jurisdiction; however, serious crimes generally carry higher penalties than other crimes and are given higher priority by enforcement officers, prosecutors and the judiciary. In some jurisdictions, all serious crimes are considered predicate crimes for money laundering offences, which allows anti-money laundering methods to be used to combat corruption and wildlife crime (see strategies #53, #54 and #55). It may also be easier to secure extradition for suspects in serious crimes, which may provide a basis for international co-operation.

12. Ensure states enact anti-corruption measures outlined in Conventions to which they are party.

International Conventions such as the OECD Anti-Bribery Convention and the UN Convention against Corruption (UNCAC) contain anti-corruption measures that Parties are legally bound to implement. These should be reflected in legislation and enforcement.

13. Ensure wildlife trade is included in states’ reviews of measures against corruption.

States that are Parties to international Conventions such as UNCAC are required to undergo regular review of measures taken to combat corruption. These reviews should specifically address measures taken against corruption in agencies charged with protecting wildlife, regulating wildlife trade and enforcing laws related to wildlife.

CO-OPERATION

Both corruption and wildlife crime are multi-sectoral problems that often involve international players. It is therefore critical that agencies involved in combating wildlife-related corruption co-operate on national and international levels to ensure that information, evidence, procedures and products are shared and followed up.

14. Establish anti-corruption units.

To function well, these must have a strong mandate, strong powers such as the right to access financial records of officials who are under investigation, adequate capacity and resourcing, and clear jurisdiction. They must be independent from external interference and accountable for their performance and conduct. Anti-corruption units must be able to offer incentives to attract skilled, ethical and enthusiastic officers.

15. Create multi-agency taskforces.

These can help with information sharing and co-operate on specific investigations or initiatives.

16. Share information.

Information should be shared between anti-corruption and anti-trafficking units, wildlife protection officers, law-enforcement and prosecution.

17. Establish processes for multi-sectoral dialogue.

Discussion among the various agencies involved in wildlife protection, regulation and enforcement can provide a clear understanding of the needs, capacities, constraints, powers and mandates of other sectors, and enable the development of unified strategies for combating corruption and wildlife crime. Multi-sectoral dialogue can also identify discrepancies in information received and disseminated by the various agencies, which can indicate corruption. For example, if Customs officials report inspecting a larger number of permits than officials responsible for issuing such permits claim to have issued, this may indicate the use of forged permits. Dialogue could both increase the risks of investigation for corrupt personnel and suggest areas for co-operation in training, in this example perhaps by training Customs officials to distinguish genuine permits from forged ones.

18. Develop close relationships between wildlife enforcement and prosecution.

This facilitates information-sharing, joint enforcement efforts, and sharing of feedback.

“Without prosecutions, seizures of contraband merely constitute a business expense.”
EIA 2014 p.14

¹⁶ UNODC 2012, p.41.

ACCOUNTABILITY

All personnel should receive proper oversight and be made accountable to their management and ultimately the public for their work.

19. Make personnel accountable for their performance and conduct.

Officials and employees in all areas of wildlife protection and law enforcement should be evaluated on their performance and use of discretionary powers. Performance should be measured consistently over time against specific indicators, providing information for management decisions. Results should be reported regularly and publicly, and staff should be held accountable for their performance.

20. Increase transparency of prosecutions for wildlife crimes.

This should include publicly reporting judicial decisions and statistics on prosecutions. This information could be disseminated through websites hosted by judicial or prosecutorial offices or by CSOs, or by using the media to publicise the progress and outcomes of cases.

21. Maintain mechanisms for complaint reporting and response.

These should permit reporting of officials by other officials as well as complaints by members of the public. Measures for responding to complaints should be specified. Reporting mechanisms should allow anonymous complaints, and investigations should be carried out by independent agencies with investigative training.

22. Encourage communication between agencies involved in wildlife management and protection.

Communication can allow agencies to monitor each others activities and act as checks on corruption (see #17).

JUDICIAL INTEGRITY

To function with legitimacy and effectiveness, courts must be free of improper influence from other areas of government and private interests. The strategies below can be used with others on this list, including strategies for record-keeping, human resources, and improving accountability, to foster integrity in the judiciary.

23. Promote the independence of the judiciary.

The relationship between the judiciary and the rest of the government should be clarified. Judicial independence can be encouraged by: granting life tenure to judges; ensuring judges receive adequate pay; ensuring judiciary have control over judicial functions, removal and transferral of judges, and rules of procedure and practice; prohibiting judges from participating in executive functions of government or holding positions in political parties; and prohibiting judges from participating in cases in which they have a conflict of interest.

24. Ensure oversight of judicial activity.

Establish an independent body to oversee judicial activity, investigate possible infractions of laws or codes of conduct and potential conflicts of interest, and impose penalties for corrupt or incompetent behaviour.

“Greater transparency and communication are [...] important tools to prevent and suppress wildlife and forest offences more effectively.”

UNODC 2012, p.184

LAW ENFORCEMENT

Effective enforcement of anti-corruption legislation and laws against wildlife crime is crucial to deterring illegal trade in wildlife.

25. Target law enforcement to the right people.

To be effective, law enforcement must apprehend and prosecute important players in wildlife crime as well as low-level poachers or traders, instead of those who are driven to poach by poverty.

26. Use reward schemes.

Rewards for apprehending criminals and corrupt officials and for seizing shipments of illegal wildlife products can provide an incentive to officers to intervene in wildlife crime and resist bribes. However, reward schemes must be designed, introduced and monitored carefully as they can add risks of evidence being planted or suspects’ rights being violated.

27. Use specialized crime-fighting techniques.

Where authorities are competent to do so, informants and techniques such as controlled delivery can be used to apprehend and gather evidence against wildlife criminals and corrupt officials.

PROTECTION

Individuals and organizations involved in illegal wildlife trade, including organized crime groups, may use physical violence or other forms of intimidation and coercion to remove, silence or punish anyone who attempts to get in the way of their profits. Policymakers, legislators, enforcement officials and anti-corruption units must take measures to ensure that individuals who attempt to combat wildlife crime are protected from these risks.

28. Protect personnel doing their jobs.

Personnel in need of protection may include wildlife wardens and rangers, police, prosecutors and judges. Protection may need to be from armed poachers or other threats of physical violence, or from other forms of coercion and intimidation, such as threats to their jobs.

29. Protect witnesses and victims of wildlife crime and corruption.

The intimidation of witnesses should be criminalized. Witnesses and victims should be protected physically if necessary. Where necessary and appropriate, consider ways of providing evidence and dealing with witnesses and victims that do not require that their location or identity be disclosed. The anonymity of whistleblowers and informers should be protected where possible, including by establishing anonymous reporting mechanisms for wildlife crimes and corruption.

“If the alleged wildlife or forest offence is investigated by officers not sufficiently familiar with the relevant background, techniques, processes and legal requirements, it is possible that the integrity of the investigations may be compromised, with potential implications for subsequent prosecutions and trials.”

UNODC 2012, p.77

HUMAN RESOURCES

Well-considered hiring, training, promotion, management and remuneration strategies contribute to building a skilled, passionate and ethical workforce who are motivated and able to fight wildlife crime and corruption.

30. Ensure personnel are paid adequately and promptly.

Regular and fair pay improves morale and empowers government officials and other employees to resist bribes.

31. Raise the status of wildlife protection and enforcement personnel.

Including by increasing staffing and resources, improving training and hiring processes, and ensuring pay is commensurate with personnel in other areas of law enforcement. Public recognition of individuals involved in wildlife protection and enforcement and appreciation for the value of their work can also help raise status.

32. Ensure transparent processes for hiring and promotion.

Hiring and promotion should be based on merit, education and experience, and procedures for hiring and promotion should be clear and transparent. Candidates who offer inducements to obtain a post should automatically be disqualified, and policies should state this explicitly.

33. Perform background checks on recruits.

Background checks can confirm information on applications, including an applicant's identity, help determine an applicant's suitability for the job, and reduce the risk of hiring someone with prior involvement in wildlife crime or corruption.

34. Have a probationary period before new recruits are confirmed.

Probationary periods help ensure personnel have the skills and attitudes necessary to perform their job.

35. Consider rotating personnel to different departments and agencies after a set period of time.

Staff rotation has been shown to reduce levels of bribery and corruption. Moving personnel regularly reduces the chance of conflicts of interest arising and is thought to make it harder for those who would like to bribe or coerce personnel to predict their behaviour, expect reciprocation for bribes or favours, or develop long-term relationships with corrupt officials or employees. Policies on staff rotation should take account of constraints on training and the value of experience in a given role, for example by keeping staff in similar roles while moving them to different locations, or by changing reporting relationships.

36. Train personnel on legislation, procedures and methods relevant to their work.

Personnel in all agencies must be aware of the laws and methodological considerations that govern their work and that can be used to combat wildlife crime and corruption.

37. Train personnel to identify trade-restricted species.

Wildlife protection staff and enforcement and Customs officials should be trained to differentiate trade-restricted species from related species. This is essential in order to check documentation, control movement of wildlife in trade, and prevent the laundering of wildlife that has been collected illegally.

38. Periodically refresh training for all personnel throughout their careers.

Staff at all levels should have regular refresher training in relevant areas of their work.

RESOURCING

39. Provide adequate resources.

Ensure wildlife wardens and rangers, law enforcement and Customs agencies, and prosecutors have the equipment necessary to perform their jobs. This may include vehicles and equipment for patrolling, a constant power supply, computer systems for storing, analysing and generating data, forensic equipment, weapons, and other tools.

40. Use automated systems.

Particularly in Customs and border agencies, but also potentially elsewhere, automatic systems for checking documentation or marks on specimens may be more efficient than checking manually. Automation may reduce discretion and therefore the opportunity for corruption. Automated systems can be used to restrict information to specific individuals, creating a chain of custody that can be followed during investigations.

INTEGRITY

Establishing a culture of integrity within organizations is a notoriously nebulous and difficult thing to do. However, it may be facilitated by strategies listed just below and by other strategies on this list for hiring, training, promoting and rotating staff, and for developing transparency, accountability and public oversight. The World Customs Organization provides principles and guidelines for developing an organizational culture of integrity in its Revised Arusha Declaration and Revised Integrity Development Guide, which are described in **Part 4** of this document.

41. Have a code of conduct.

Including specification of deterrent responses for violations of the code. All employees, including senior officials and judges, should be required to read and sign the code of conduct.

42. Provide ethics guidelines.

Guidelines for ethics can help create a sense of professional identity that includes ethical behaviour. Ethics guidelines should promote high standards of integrity by providing a benchmark for behaviour, and can be used to give a framework for professional activities that adhere to ethical principles.

43. Have a clear policy on gifts and entertainment.

This should specify under what conditions, if at all, an employee or an employee's family member may accept a gift or offers of entertainment (e.g. lavish meals, tickets to events) and of what type and value, and require reporting of any gifts and entertainment received. The policy should include provisions for how it will be enforced, as well as limits or restrictions on the nature or form of such gifts.

44. Provide ethics training.

Ethics training communicates to personnel that their agency values ethical behaviour. Ethics training can help employees recognise specific kinds of unethical behaviour, including various forms of corruption, and learn to identify and avoid conflicts of interest. Training can help employees identify red flags for corrupt behaviours among their colleagues, and ensure they are aware of the proper reporting mechanisms for incidences of suspected corruption.

RECORDS AND DOCUMENTATION

Maintaining proper records and control of wildlife products, evidence, data and documentation makes it harder for criminals and corrupt officials and employees to launder illegal wildlife, conceal corruption, and escape investigation and prosecution.

45. Have a clear chain of custody for legal trade products.

This should include systems for marking and identifying legal wildlife in trade and for checking these at source as well as at points of transit, processing, export, import and sale.

46. Check the validity of documents for trade.

Including checking documents against contents of shipments.

47. Have a clear chain of custody for evidence.

Including careful record-keeping, checks, and oversight.

48. Store data and evidence securely.

Data and evidence should be stored securely and systematically. Evidence should be inventoried, only personnel involved in an investigation should have access to evidence relating to that investigation, and access should be logged. This allows individuals who have accessed information to be identified, creating a clear paper-trail that can be recovered in the case of investigations.

49. Avoid unnecessary fees for licences and permits.

Unreasonably high fees may encourage corruption in order to avoid payment.

50. Avoid unnecessary requirements for licences and permits.

All requirements for obtaining licences and permits must have a useful purpose. Unnecessary requirements add to the workload of officials and may provide opportunities for corruption in order to facilitate or speed up applications. They may also make it more likely that officials will fail to check that applicants meet requirements properly. CITES provides guidelines on information that should be included on the various permits and certificates required by CITES. Processes should be streamlined as much as possible, with regular reviews on how efficiency can be improved.

51. Impose time limits or targets for processing applications for licences and permits.

Reasonable time limits for processing licence and permit applications can reduce the incentive to offer or solicit bribes in exchange for speeding up applications. Time limits should be clearly articulated, communicated to the public, monitored and enforced.

52. Penalize failure to control and keep records of documentation properly.

Personnel and their managers can be held accountable for properly storing, granting, and tracking permits, licences and other documents, and for ensuring that they have been filled out fully and accurately. However, it must be ascertained that departments are resourced adequately to fulfil these responsibilities before penalties are introduced.

ANTI-MONEY LAUNDERING (AML)

“Countries must follow the money and deploy anti-money-laundering tools and training to make the risks of wildlife crime greater than the rewards by increasing the cost of doing business.”

Ratchford *et al.* 2013, p.26

Preventing, investigating and penalizing enrichment from the proceeds of crime can be more effective than focusing directly on corruption or on specific instances of wildlife-related crime. Illicit enrichment can be easier to identify and target than corruption. Penalizing the main beneficiaries of wildlife crime also targets the big players in illegal wildlife trade rather than low-level poachers, traffickers or corrupt officials and employees. Applying financial penalties can act as an effective deterrent, raising the operating costs of illegal wildlife trade, potentially to levels that are unsustainable for organizations involved in this trade.

53. Ensure states implement AML measures required by UNCAC.

UNCAC requires Parties to take measures to prevent money laundering, including ensuring that financial institutions deter and detect instances of money laundering. This means that in many countries a legal and regulatory framework is already in place for combating enrichment through the proceeds of crime. States that have not already acceded to UNCAC should be encouraged to do so, and Parties to UNCAC should be monitored for compliance and encouraged to implement their AML commitments under UNCAC effectively.

54. Require financial institutions to apply AML measures to wildlife crime.

AML laws require financial services to help police crime. Assets can be recovered from criminals, and it can be made more complicated, difficult and expensive for criminals to launder the proceeds of crime. If banks screen for wildlife crime as part of their AML measures, countries and industries with significant incidents of wildlife crime can be assessed as higher risks for lending and access to financial services. This increases borrowing costs and provides an incentive for governments and industries to implement better controls on corruption and wildlife crime.

55. Recognize corrupt activities and wildlife crimes as predicate offences for money laundering.

Predicate offences are crimes whose proceeds can be integrated into the legal market in contravention of AML laws. Some jurisdictions define all crimes, or all serious crimes, as predicate offences; others recognize only certain types of crime as predicate offences. In order to allow AML measures, including asset seizure, to be enacted against corrupt activities and wildlife crimes, these should be encompassed by the legal definition of a predicate offence.

STRATEGIES FOR CSOs

56. Participate in official reviews of States’ compliance with international Conventions.

CSOs can monitor and/or advise States during their reviews of measures taken to comply with international treaties and conventions against corruption (UNCAC, OECD Anti-Bribery Convention) and to protect wildlife (CITES). CSOs can also disseminate information to the public on compliance with these agreements.

57. Monitor corruption in agencies involved in wildlife protection and law enforcement.

CSOs can measure and monitor transparency, corruption and performance in agencies responsible for wildlife protection and law enforcement. Communicating the results to other relevant agencies and the public can encourage agencies to make efforts to improve as well as identify specific areas in need of improvement.

AWARENESS

Awareness of the nature and harms of wildlife crime and corruption among all areas of wildlife protection, law enforcement and the judiciary, as well as the public, is crucial to reducing opportunities for corruption and motivating anti-corruption efforts.

58. Raise awareness of corruption and its harms.

Officials, other employees and the public should know what corruption is, be aware of different forms of corruption, and understand the harms caused by corruption.

59. Raise awareness of wildlife crime and its harms.

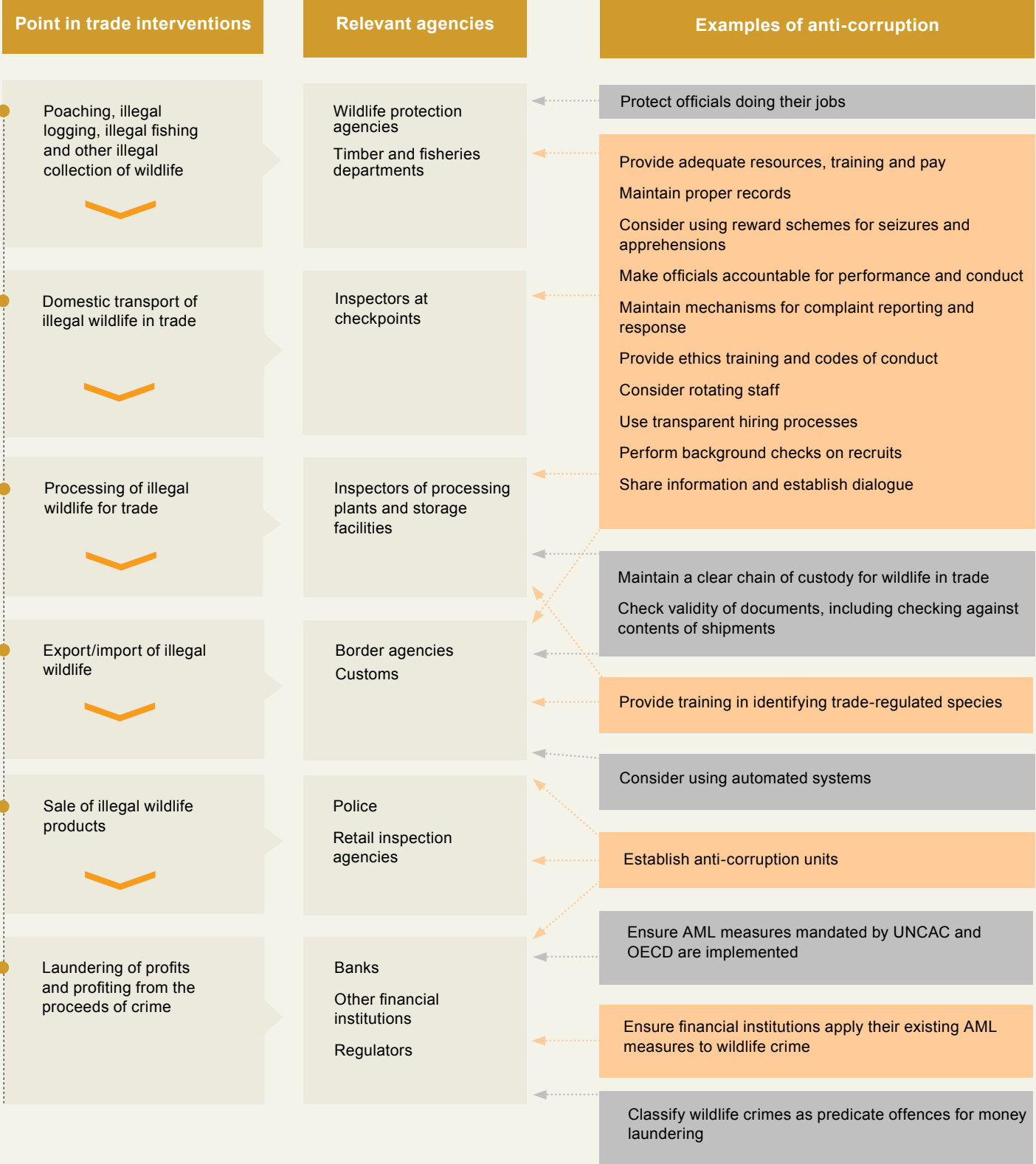
Government officials, wildlife protection personnel, law enforcement officers, prosecutors, the judiciary and the public should understand that illegal trade in wildlife is not a victimless crime.

OTHER

60. Lobby for reforms.

Most stakeholders in wildlife protection are not directly involved in the writing of legislation or policy. The media, CSOs and the public, as well as wildlife protection, Customs and law enforcement agencies, can call for reforms to wildlife law, anti-corruption law, and the relation between the judiciary and the government. Financial services and their regulators can be lobbied to ensure that AML measures respond to the illegal money being laundered through the legal wildlife industry. International instruments, particularly UNCAC and OECD, provide legitimacy for these efforts, since signatories are under a legal obligation to enact measures to comply with the agreements.

Figure 1:
Trade chain, with examples of anti-corruption interventions at each point





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Ivory confiscated by the Ministry of Forests and Wildlife, Cameroon.

PART 4: MORE HELP FIGHTING WILDLIFE-RELATED CORRUPTION

The resources described here provide detailed information on corruption, guidance on identifying and implementing anti-corruption measures, and training for combating corruption in wildlife trade.

They are an essential next step for individuals, organizations and governments intending to prevent and mitigate corruption relating to wildlife crime.

The following tools and toolkits present methods for identifying sources, risks and enabling factors of corruption, and/or can help identify, select, design, prioritize and implement anti-corruption strategies. Most of these toolkits have not been designed with the wildlife sector specifically in mind, but many of the strategies can be used to combat wildlife-related corruption.

Tools and Toolkits for combating corruption and wildlife crime

ORGANIZATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT (OECD) CLEANGOVBIZ TOOLKIT

Draws together anti-corruption tools to support governments, organizations and civil society in building integrity and fighting corruption. Anti-corruption strategies are described for a wide range of areas, including regulatory policy, judicial practices, export credits, civil society, whistle-blower protection, investigative media, bribery, money laundering and asset recovery. Sections on each topic provide checklists, guidance on implementation, examples of good practices and further resources.

www.oecd.org/cleangovbiz/toolkit/

TRANSPARENCY INTERNATIONAL. 2002. CORRUPTION FIGHTERS' TOOLKIT: CIVIL SOCIETY EXPERIENCES AND EMERGING STRATEGIES

Provides descriptions of civil society projects to reduce corruption in various sectors of society in several countries. Projects include efforts to raise public awareness, monitoring of public institutions, increasing citizen participation in decision-making processes and creating opportunities for communication between governments and citizens.

www.issuu.com/transparencyinternational/docs/2002_corruptionfighterstoolkit_en?e=2496456/3088679

TRANSPARENCY INTERNATIONAL 2013. DIAGNOSING BRIBERY RISK: GUIDANCE FOR THE CONDUCT OF EFFECTIVE BRIBERY RISK ASSESSMENT

A tool for helping organizations identify and evaluate their exposure to bribery risks.

www.issuu.com/transparencyuk/docs/diagnosing_bribery_risk?e=10896477/7671939

UNODC 2003. UN GUIDE FOR ANTI-CORRUPTION POLICIES

Explains various forms of corruption and provides guidelines for developing, monitoring and evaluating anti-corruption strategies, as well as for institution building, preventing corruption, raising awareness, increasing public participation, and hampering the illicit transfer of the proceeds of crime.

www.unodc.org/pdf/crime/corruption/UN_Guide.pdf

UNODC 2004. THE GLOBAL PROGRAMME AGAINST CORRUPTION. UN ANTI-CORRUPTION TOOLKIT, 3RD ED

This toolkit provides an inventory of anti-corruption measures aiming to help governments integrate anti-corruption measures into national anti-corruption strategies. Tools for combating corruption are provided under the categories of institution building, situational prevention, social prevention, enforcement, and recovery of the proceeds of crime. The toolkit also includes chapters on assessing corruption and on monitoring and evaluation.

www.unodc.org/pdf/crime/corruption/toolkit/corruption_un_anti_corruption_toolkit_sepo4.pdf

UNODC 2004. UN HANDBOOK ON PRACTICAL ANTI-CORRUPTION MEASURES FOR PROSECUTORS AND INVESTIGATORS

Provides a range of strategies for fighting corruption for use by prosecutors and investigators. The handbook defines corruption and the role of prosecutors and investigators, and suggests strategies for detecting corruption, using evidence, protecting whistle-blowers, performing financial investigations and electronic surveillance, performing undercover operations, and testing for integrity. The handbook also includes a summary and discussion of the UN Convention against Corruption (UNCAC).

www.unodc.org/pdf/crime/corruption/Handbook.pdf

UNODC 2006. CRIMINAL JUSTICE ASSESSMENT TOOLKIT

A tool to assist in assessing, and designing and implementing reforms in, criminal justice systems, including promoting the integrity and accountability of the police and judiciary and protecting witnesses and victims. The toolkit also provides a guide to key issues, UN Conventions and international law relating to judicial structures.

www.unodc.org/documents/justice-and-prison-reform/cjat_eng/CJAT_Toolkit_full_version.pdf

UNODC 2012. WILDLIFE AND FOREST CRIME ANALYTIC TOOLKIT, REV. ED

An important resource aimed at wildlife and forestry officials, Customs and other enforcement agencies. The toolkit creates a framework for analysing measures to prevent and respond to wildlife crime in any country, and can be used for training. The five sections of the toolkit present analytic tools for identifying gaps and strategies for (1) improving legislation, (2) enforcement, and (3) the judiciary and prosecution, for (4) identifying drivers and means to prevent wildlife crime, and (5) data and analysis.

www.unodc.org/documents/Wildlife/Toolkit_e.pdf

WORLD CUSTOMS ORGANIZATION (WCO) 2014 REVISED INTEGRITY DEVELOPMENT GUIDE

A framework for enhancing integrity and developing anti-corruption strategies in Customs organizations, including self-assessment tools and guidelines for developing strategies to promote integrity and raise awareness.

www.wcoomd.org/en/topics/integrity/~/media/WCO/Public/Global/PDF/Topics/Integrity/Instruments%20and%20Tools/Integrity_guide_EN.ashx

Training

ASEAN WILDLIFE ENFORCEMENT NETWORK

ASEAN-WEN organizes training programmes for wildlife protection and enforcement officers across Southeast Asia.

www.asean-wen.org

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES) THE CITES VIRTUAL COLLEGE

Hosts online training materials including courses on implementing CITES for wildlife trade management, law enforcement and Customs officers and information for prosecutors and the judiciary. Courses include training in identifying CITES-listed species, and the website also provides tools for species identification. Reference materials and materials for workshops and training courses on numerous issues related to CITES implementation and enforcement are also available on the website.

www.cites.unia.es/cites/

UNITED NATIONS OFFICE ON DRUGS AND CRIME (UNODC) TRACK: TOOLS AND RESOURCES FOR ANTI-CORRUPTION KNOWLEDGE

UNODC promotes anti-corruption education and organizes workshops and courses. The latter include the Anti-Corruption Academic Initiative (ACAD) and the Academic Course on the United Nations Convention against Corruption (UNCAC). The syllabi for these are available on the website and could be useful for designing anti-corruption courses.

www.track.unodc.org

WORLD BANK E-INSTITUTE GOVERNANCE TRAINING

The website hosts webinars, learning materials, and online courses relating to governance, including free courses on social accountability, parliaments and climate change, and parliaments and anti-corruption.

www.einstitute.worldbank.org/ei/CourseTheme/46

WORLD CUSTOMS ORGANIZATION WEBSITE

Includes online training materials in Customs procedures, including integrity and anti-corruption, and provides a platform for creating and disseminating Customs training.

www.wcoomd.org

International instruments

Several international Conventions act as binding agreements for participating countries to fight corruption and/or wildlife crime. Other conventions, agreements or instruments provide guidelines for developing strategies to counter corruption and/or wildlife crime. In addition to the instruments listed here, there exist many regional and bilateral agreements on corruption and wildlife crime, while national policy and legislation can also provide tools and guidelines for combating corruption in the wildlife trade.

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES)

Also known as the Washington Convention, CITES is a multilateral treaty to protect wildlife, which became effective in 1975. The Convention lists protected species of plants and animals in three Appendices. Appendix I lists about 950 species that are threatened by extinction. It is illegal to trade commercially in wild-caught specimens of CITES Appendix I species, and any import or export requires a permit. Appendix II lists about 35 000 species that may not be threatened with extinction but that require regulation in order to avoid becoming threatened. Appendix II species may be traded internationally with permits. Appendix III includes about 160 species that have been listed by request of CITES member countries in order to help that country control trade in that species. International trade in these species is permitted only with permits. Participating countries must enact legislation and enforcement measures to implement CITES requirements.

www.cites.org/eng/disc/text.php

ORGANIZATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT (OECD) 1994 CONVENTION ON COMBATING BRIBERY OF PUBLIC OFFICIALS IN INTERNATIONAL BUSINESS TRANSACTIONS

Commonly known as the OECD Anti-Bribery Convention. Establishes legally binding standards for criminalizing bribery of foreign officials. All OECD countries plus several others have signed the Convention and are required to take steps to implement it.

www.oecd.org/daf/anti-bribery/ConvCombatBribery_ENG.pdf

UNITED NATIONS CONVENTION AGAINST TRANSNATIONAL ORGANIZED CRIME (UNTOC) 2000

Also known as the Palermo Convention. Presents numerous anti-corruption measures and encourages Parties to establish domestic criminal offences and frameworks for extradition, mutual legal assistance, and law enforcement co-operation. UNTOC seeks the standardization and co-ordination of attempts to suppress transnational organized crime, and focuses in particular in human trafficking, human smuggling, and arms manufacturing and trafficking.

www.unodc.org/documents/middleeastandnorthafrica//organized-crime/UNITED_NATIONS_CONVENTION_AGAINST_TRANSNATIONAL_ORGANIZED_CRIME_AND_THE_PROTOCOLS_THERETO.pdf

UNITED NATIONS CONVENTION AGAINST CORRUPTION (UNCAC) 2003

The first legally binding multilateral Convention against corruption, requiring States that are Parties to implement anti-corruption strategies.

www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf

UNITED NATIONS 2005. COMPENDIUM OF INTERNATIONAL LEGAL INSTRUMENTS ON CORRUPTION. 2ND ED

A compilation of all major global and regional international treaties and instruments for combating corruption.

www.unodc.org/documents/corruption/publications_compendium_e.pdf

WORLD CUSTOMS ORGANIZATION 2003. REVISED ARUSHA DECLARATION

A non-binding agreement containing general principles for combating corruption and encouraging integrity in Customs organizations.

www.wcoomd.org/en/topics/integrity/overview.aspx

ASEAN WILDLIFE ENFORCEMENT NETWORK

www.asean-wen.org

Includes species identification factsheets, including versions tailored to specific countries including Indonesia, Malaysia, Thailand, Singapore and others. An English version is available online but expanded versions aimed at law enforcement officials are also available in English and multiple other languages.

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES)

www.cites.org

Contains useful information on wildlife conservation and the International Consortium on Combating Wildlife Crime (ICWC): a partnership formed to combat illegal trade in wildlife, made up of CITES, the United Nations Office on Drugs and Crime (UNODC), INTERPOL, the World Bank, and the World Customs Organization (WCO). Training materials are also available on the website.

ORGANIZATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT (OECD)

www.oecd.org

Includes information and materials on corruption and links to the OECD Anti-Bribery Convention in several languages. Country reports on enforcement of the Anti-Bribery Convention can also be found here.

FINANCIAL ACTION TASK FORCE (FATF)

www.fatf-gafi.org

Contains information on corruption and on financial measures for countering money laundering and terrorist financing. These include reports, recommendations, best practices, and guidelines for implementing FATF recommendations.

TRANSPARENCY INTERNATIONAL

www.transparency.org

Transparency International is an important anti-corruption organization with one of the most informative and user-friendly websites for issues relating to corruption. The website includes information on corruption in areas relevant to wildlife such as the judiciary, forestry, whistleblowing, poverty and development, climate change, and water. The site also includes several anti-corruption toolkits, tools for measuring corruption, country profiles, and a plain language guide. Information on corruption includes reports on several measures for corruption in various countries, including the Corruption Perceptions Index, the Global Corruption Barometer, the Bribe Payers Index and the Global Corruption Report, as well as country profiles and national reports on corruption.

UNITED NATIONS OFFICE ON DRUGS AND CRIME (UNODC)

www.unodc.org

Includes information on corruption and international anti-corruption efforts as well as several toolkits. Country corruption assessments are also available on the website.

UNODC. TRACK: TOOLS AND RESOURCES FOR ANTI-CORRUPTION KNOWLEDGE

www.track.unodc.org

An online resource centre for combating corruption, including a legal library, education centre, tools for asset recovery, and information on the role of the private sector and civil society in reducing corruption.

WORLD CUSTOMS ORGANIZATION

www.wcoomd.org

Hosts online Customs training, and information and resources on Customs, including enforcement, compliance and integrity. The site also includes materials used in Project GAPIN, which aimed to help Customs organizations in Africa combat illegal trade in wildlife.

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